### UNITED STATES DISTRICT COURT FOR THE DISTRICT COURT OF MASSACHUSETTS

ARBOR NETWORKS, INC.,

Plaintiff,

V.

WILLIAM E. RONCA III, RICHARD SHIRLEY, DOUGLAS FLEMING, JAMES GILL, JAMES NEEL, JASON MCEACHIN, MICHAEL L. PORTER, ANDREW HENKART, PAUL SCANLON, MICHAEL HOLLYMAN, and RED LAMBDA, INC.,

Defendants.

Civil Action No.: 1:12-cv-11322-NMG

## MOTION FOR ADMISSION PRO HAC VICE OF THOMAS A. DYE

Pursuant to Local Rule 83.5.3, the undersigned counsel hereby moves that Thomas A. Dye, Esq., of Carlton Fields, CityPlace Tower, 525 Okeechobee Boulevard, Suite 1200, West Palm Beach, FL 33401, be admitted to appear on behalf of Defendant Red Lambda, Inc., and to practice before this Court in the above-entitled action. As grounds for this motion, the undersigned counsel respectfully represents the following:

- 1. Mr. Dye is and has been a member in good standing of the bar of the State of Florida since 1981 and the bar of the District of Columbia since 1985 and the bar of Colorado since 1995;
- 2. There are no disciplinary proceedings pending against Mr. Dye as a member of the bar in any jurisdiction;
- 3. Mr. Dye has represented to the undersigned counsel that he is familiar with the Local Rules of the United States District Court for the District of Massachusetts;

- 4. In further support of this motion, Mr. Dye has submitted as <u>Exhibit A</u> hereto his Certificate of Good Standing as required by Local Rule 83.5.3; and
- 5. Red Lambda, Inc., expressly reserves, and does not waive, its rights to challenge venue and personal jurisdiction.

WHEREFORE, the undersigned counsel respectfully moves Mr. Dye's admission to practice before this Court *pro hac vice*.

Respectfully submitted,

/s/ Stephen D. Riden

Russell Beck (BBO # 561031) Stephen D. Riden (BBO # 644451) BECK REED RIDEN LLP 155 Federal Street, Suite 1302 Boston, MA 02110

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Dated: July 25, 2012

### **CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified in the Notice of Electronic Filing and paper or electronic copies will be delivered to those indicated as non-registered participants on July 25, 2012.

/s/ Stephen D. Riden
Stephen D. Riden

# Exhibit A

# UNITED STATES DISTRICT COURT FOR THE DISTRICT COURT OF MASSACHUSETTS

ARBOR NETWORKS, INC.,

Plaintiff,

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Dated: July 23, 2012

WILLIAM E. RONCA III, RICHARD SHIRLEY, DOUGLAS FLEMING, JAMES GILL, JAMES NEEL, JASON MCEACHIN, MICHAEL L. PORTER, ANDREW HENKART, PAUL SCANLON, MICHAEL HOLLYMAN, and RED LAMBDA, INC.,

Defendants.

Civil Action No.: 1:12-cv-11322-NMG

#### **CERTIFICATE OF GOOD STANDING**

Pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts, I, Thomas A. Dye, Esq., hereby certify that: (1) I am admitted to the bars of the Courts described in the foregoing motion; (2) I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice; (3) No disciplinary proceedings are pending against me as a member of any bar in any jurisdiction; and (4) I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Respectfully submitted,

Thomas A. Dye

Florida Bar No. 335207